

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.
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Case No.: 1:22-cv-1032 (PKC)(JRC)

**DECLARATION OF
VITO GELARDI**

VITO GELARDI, hereby declares and verifies the truth of the following, under penalty of perjury under the laws of the United States of America, pursuant to Title 28, United States Code, Section 1746:

1. I am a defendant in the above-captioned matter, and I am fully familiar with the facts set forth herein. I make this declaration in opposition to plaintiff's latest contempt motion. (288).

2. Plaintiff has failed to make any allegations suggesting that I engaged in any conduct that could be deemed as contemptuous. Plaintiff has yet again improperly accused me of contempt by lumping me together with my wife (who I believe has done nothing wrong), without making any effort to identify any alleged acts of contempt committed by me personally.

3. I have already been damaged once before by plaintiff's improper grouping of all defendants together as one when an order of attachment was issued against my share of the net proceeds from a proposed sale of our Staten Island home based upon plaintiff's false allegation that it will obtain a contempt judgment against me, and I respectfully request that the Court summarily

dismiss plaintiff's latest contempt application as against me to prevent something like that from happening again.

4. To the extent plaintiff's motion could be read to include allegations of contempt against me, I categorically deny violating any Court Order.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 10, 2024.


Vito Gelardi